

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF WEST VIRGINIA**

Friedrichs Harris, Administrator of the
Estate of Evan M. Harris, deceased,

Plaintiff,

v.

Civil Action No. 2:16-cv-46
Judge Bailey

Q & A Associates, Inc.
Angela Shockley, Individually,
Keith Bishop, Individually,
Matthew Shockley, Individually,
Sandy Schmiedeknecht, Individually, and,
Tammy Robbins, Individually,

Defendants.

PLAINTIFF'S OBJECTIONS TO DEFENDANTS' PROPOSED VERDICT FORM

NOW COMES Plaintiff, by and through his attorney, David A. Sims, and hereby files the within Objections to *Defendants' Proposed Verdict Form* as follows:

Plaintiff objects to Defendants' proposed verdict form because Defendants' proposed form does not address all of Plaintiff's claims. Defendants' proposed form fails to include Plaintiff's claims for intentional infliction of emotional distress, violations of the West Virginia Consumer Credit and Protection Act, and intentional misrepresentation of fact. (*See Complaint ECF #1*). These Defendants moved for summary judgment on these claims and the Court has denied their motion, thus it is proper for these things to be included on the jury verdict form to be utilized in this case.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court sustain Plaintiff's objections to *Defendants' Proposed Verdict Form* as set forth above.

Respectfully submitted,

Friedrichs Harris, Administrator

s/David A. Sims

By:

David A. Sims (#5196)
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CERTIFICATE OF SERVICE

I David A. Sims as counsel for Plaintiff do hereby certify that I served PLAINTIFF'S OBJECTIONS TO DEFENDANTS' PROPOSED VERDICT FORM T by CM\ECF counsel for Defendants:

Lindsey M. Saad, Esquire
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Dated at Vienna, West Virginia on this 24th day of May 2018.

Friedrichs Harris, Administrator
By counsel,

/s/David A. Sims

David A. Sims (W.Va. Bar No. 5196)

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